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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15
16 SHOSH YONAY, an individual, and
17 YUVAL YONAY, an individual,
18 Plaintiffs,
19 v.
20 PARAMOUNT PICTURES
21 CORPORATION, a Delaware
22 corporation,
23 Defendant.

Case No. 2:22-CV-3846-PA-GJS

**JOINT STIPULATION FOR
EXPANSION OF WORD LIMIT
FOR SUMMARY JUDGMENT
BRIEFING**

District Judge: Hon. Percy Anderson
Magistrate Judge: Hon. Gail J. Standish

STIPULATION

Plaintiffs Shosh Yonay and Yuval Yonay (“Plaintiffs”) and Defendant Paramount Pictures Corporation (“Paramount Pictures”) (collectively, the “Parties”) stipulate as follows:

WHEREAS, Plaintiffs and Paramount Pictures intend to file cross-motions for summary judgment;

7 **WHEREAS**, the contemplated motions will require the Parties to
8 undertake a substantial similarity analysis comparing in detail the elements of
9 the disputed works for Plaintiffs' copyright infringement claim, on top of
10 briefing the issues presented by Plaintiffs' claims for declaratory relief and
11 breach of contract;

12 **WHEREAS**, the Parties are aware of the recent change in Local Rules
13 now limiting memoranda of points and authorities to 7,000 words, absent an
14 order from the Court;

15 **WHEREAS**, on Paramount Pictures' earlier motion to dismiss, the Parties
16 used the full 25 pages allotted under the Court's then-operative rules, yet now
17 would be required to condense their summary judgment briefing into even less
18 space, while also incorporating developments in the record;

19 **WHEREAS**, the Parties agree that a mutual expansion of the word limit
20 for their summary judgment briefs would enable the Parties to fully flesh out the
21 issues and facilitate the Court's informed decision on the merits.

22 Based on the foregoing, **IT IS HEREBY STIPULATED** by and between
23 the Parties, through their respective counsel of record, subject to the Court's
24 approval, that:

25 1. The Parties' memoranda of points and authorities in support of, and
26 in opposition to, their cross-motions for summary judgment each may contain up
27 to 10,000 words; and

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2. The Parties' reply briefs in support of their cross-motions for

1 summary judgment each may contain up to 6,000 words.

2 3. In the alternative, if the Court is not inclined to grant the requested
3 word limit, that the Parties may submit briefs, in accordance with the Court's
4 prior default rule, of up to 25 pages in support of, or in opposition to, their cross-
5 motions for summary judgment, and up to 12 pages on reply.

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7 Date: October 20, 2023

O'MELVENY & MYERS LLP

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9 By: /s/ *Molly M. Lens*
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SIGNATURE ATTESTATION

Pursuant to CACD Local Rule 5-4.3.4(a)(2)(i), I certify that I have obtained authorization to file this document from the other signatories to this document and that all other signatories have authorized placement of their electronic signature on this document.

Date: October 20, 2023

O'MELVENY & MYERS LLP

By: _____ /s/ Molly M. Lens
Molly M. Lens